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Attorneys for Defendant
CANON INFORMATION TECHNOLOGY SERVICES, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

STEPHANIE NICOLE GONZALEZ-
COLON, as an individual,

Plaintiff,

v.

FRASCO, INC. d/b/a
FRASCOFILES, CANON
INFORMATION TECHNOLOGY
SERVICES, INC, and DOES 1-10
inclusive,

Defendants.

CASE NO. 2:25-CV-04414

Hon. Maame Ewusi-Mensah Frimpong
Courtroom 8B

[Los Angeles Superior Court Case No.
25NNCV02482]

**DEFENDANT CANON
INFORMATION TECHNOLOGY
SERVICES, INC.'S NOTICE OF
MOTION AND MOTION TO
DISMISS PLAINTIFF'S
COMPLAINT**

[Filed concurrently with Memorandum of
Points and Authorities, Declaration of
Paylina Rafter, Declaration of Brian
Griggs and [Proposed] Order]

DATE: August 14, 2025

TIME: 10:00 A.M.

**PLACE: United States Courthouse
350 West First Street
Los Angeles, CA 90012
Courtroom 8b, 8th Floor**

Complaint Filed: April 10, 2025
Trial Date: Not Set

1 **TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF**
2 **RECORD:**

3 **PLEASE TAKE NOTICE THAT** on August 14, 2025 at 10:00 a.m. or as
4 soon thereafter as the matter may be heard, in Courtroom 8D of the above-entitled
5 court located at 350 W 1st Street, Los Angeles, CA 90012-4565, before the
6 Honorable Maame Ewusi-Mensah Frimpong, Defendant Canon Information
7 Technology Services, Inc. (“Defendant” or “CITS”) will, and hereby does, move this
8 Court for an order dismissing the First Cause of Action in the Complaint filed by
9 Plaintiff Stephanie Nicole Gonzalez-Colon (“Plaintiff”), without leave to amend,
10 pursuant to Federal Rule of Civil Procedure 12(b)(2) on the following grounds:

11 This Court lacks personal jurisdiction to decide Plaintiff’s claim for Fair Credit
12 Reporting Act (“FCRA”) against CITS pursuant to Rule 12(b)(2) because Defendant
13 CITS is not subject to California’s general jurisdiction, nor can there be specific
14 jurisdiction over Plaintiff’s sole claim against CITS based on alleged wrongful
15 conduct which occurred outside California.

16 This Motion is based on this Notice of Motion and Motion, the accompanying
17 Memorandum of Points and Authorities, the Declaration of Pavlina K. Rafter, the
18 Declaration of Brian Griggs, the papers and records on file in this action, and such
19 other written and oral arguments as may be presented to the Court at the hearing on
20 this matter.

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1 This Motion is being made following the conference of counsel pursuant to
2 Local Rule 7-3, which took place on May 22, 2025 and May 23, 2025. The parties
3 were unable to resolve the issues raised herein. See Declaration of Pavlina K. Rafter,
4 ¶ 2.

5
6 Dated: June 4, 2025

DORSEY & WHITNEY LLP

7 By: /s/ Pavlina K. Rafter

Gabrielle M. Wirth

Pavlina K. Rafter

Attorneys for Defendant

CANON INFORMATION

TECHNOLOGY SERVICES, INC.

CERTIFICATE OF SERVICE

All Case Participants are registered for the USDC CM/ECF System

***Stephanie Nicole Gonzalez-Colon v. Frasco, Inc. D/B/A Frascoprofiles,
Canon Information Technology Services, Inc
United States District Court
Central District of California – Western Division
Case No.: 2:25-CV-04414***

**DEFENDANT CANON INFORMATION TECHNOLOGY SERVICES,
INC.'S NOTICE OF MOTION AND MOTION TO DISMISS PLAINTIFF'S
COMPLAINT**

I hereby certify on June 4, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States District Court, Central District of California by using the CM/ECF System.

Participants in the case who are registered CM/ECF Users will be served by the CM/ECF System.

DATED: June 4, 2025

DORSEY & WHITNEY LLP

By: /s/Pavlina K. Rafter
Pavlina K. Rafter